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**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Petition of Calpine Corporation to Adopt,  
Amend, or Repeal a Regulation Pursuant to  
Pub. Util. Code § 1708.5

P1607004 Petition 16-07-\_\_\_\_

**PETITION OF CALPINE CORPORATION TO ADOPT, AMEND, OR REPEAL A  
REGULATION PURSUANT TO PUB. UTIL. CODE § 1708.5**

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Pursuant to Section 1708.5 of the Public Utilities Code and in accordance with Rule 6.3 of the California Public Utilities Commission’s (“Commission”) Rules of Practice and Procedure,<sup>1</sup> Calpine Corporation (“Calpine”) respectfully submits this petition (“Petition”) requesting that the Commission immediately commence a rulemaking to adopt a regulation for the purpose of establishing new rules for the netting standards applicable to the California Investor Owned Utilities’ (“IOUs”) Station Power Tariffs.<sup>2</sup>

**I. INTRODUCTION**

All generation resources – whether rooftop solar, wind farms, or gas-fired generators – need to import some amount of electricity from the grid to start their resources or serve on-site load that exceeds on-site generation. Where generation and load are located behind the same meter, the IOUs bill customer generators by “netting” their load against their generation.

The outcome of this net generation calculation depends heavily on the netting interval (i.e. the time period over which generation is offset against load). Longer netting intervals are generally more favorable for customers with on-site generation because they allow customers the

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<sup>1</sup> Attachment A details the steps Calpine has taken to comply with the requirements of Rule 6.3.

<sup>2</sup> See Southern California Edison Company’s (“SCE”) Schedule SPSS, Station Power Self-Supply; San Diego Gas & Electric Company’s (“SDG&E”) Schedule SPSS, Station Power Self-Supply; Pacific Gas & Electric Company’s (“PG&E”) Electric Schedule S – Standby Service (collectively, the “Station Power Tariffs”).

flexibility to offset load and generation that may not occur contemporaneously. As a result, tariffs which offer customer generators longer netting periods are more advantageous because generators are required to purchase less energy from the grid at retail rates.

As part of California's initiatives to increase renewable generation, the Legislature directed in Public Utilities Code Section 2827 that the Commission establish net energy metering ("NEM") rules for qualified behind-the-meter renewable generators, which are commonly referred to as "NEM generators." The statute obligates the IOUs to quantify NEM generator "purchases" from the grid by netting the generator's production and load over a 12-month period. This 12-month netting rule determines: (a) the amount of energy "consumed" over the 12-month period for which the NEM generator must purchase from the IOUs; and (b) the amount of energy produced over the 12-month period for which the IOUs must compensate the NEM generator. The use of a 12-month netting period significantly increases the economic benefits of generation, particularly for generators that have large seasonal variations in their usage.

Assembly Bill ("AB") 327 modified Public Utilities Code Section 2827, and the statute no longer *requires* that NEM generators on the NEM successor tariff retain the benefits of a 12-month netting period. Nevertheless, in Decision ("D.") 16-01-044, the Commission reaffirmed the appropriateness of a 12-month netting period for NEM generators, ruling that the "annual true-up" of electricity usage and production should be continued in the NEM successor tariff.<sup>3</sup> The Commission characterized the 12-month netting period as an "intuitively-sensible feature of the existing NEM tariff" that "preserves the value of net metering for all [IOU] customers."<sup>4</sup>

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<sup>3</sup> D.16-01-044, mimeo at 94-95.

<sup>4</sup> D.16-01-044, mimeo at 95.

In stark contrast to the 12-month netting period available for NEM generators, the netting rules the Commission authorizes the IOUs to impose on the larger non-NEM generators require that the electricity which such resources purchase from the grid be netted against their production on a 15-minute basis (i.e. a netting period that is 35,040 times shorter than the 12-month netting period). The disparity between these netting periods is extreme, unwarranted, and unfair. It affects both gas-fired generators as well as large renewable resources such as geothermal and biomass generators. Purely as a consequence of the difference in netting periods, these non-NEM generators are deemed to “purchase” significantly greater amounts of retail power from the grid.

From the perspective of energy production and grid operations, non-NEM generators in almost any circumstances import less electricity from the grid than NEM generators (i.e. they export far more electricity than they consume over a comparable 12-month timeframe). However, the disparate netting periods the current rules impose on non-NEM generators exact proportionally-higher payment obligations on generators subject to the 15-minute netting rules relative to NEM generators that benefit from 12-month netting. This inequitable treatment of California’s generation resources violates the Public Utilities Code requirements that the Commission only approve, and that the IOUs only charge, rates that are just, reasonable, and non-discriminatory.<sup>5</sup>

Many non-NEM resources subject to 15-minute netting – including modern and highly-efficient combined-cycle gas generators – are already confronted with significant economic challenges. It is increasingly difficult to obtain adequate compensation for the flexible and reliable capacity these resources offer to the grid, either through short-term wholesale sales or

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<sup>5</sup> See Pub. Util. Code §§ 451, 453, 454, and 728.

longer-term bilateral contracts. Inequitable netting periods put further economic pressure on these generators. The combination of these economic factors could ultimately force many generators to shut-down, which would reduce the reliability of the State's electric grid and also increase the price that California electric consumers must pay for generation. By adopting a uniform 12-month netting period for all California generators, the Commission would reduce operational expenses for non-NEM generators, achieve greater fairness among resources, and increase the likelihood that California's existing generation fleet will be available to maintain reliability and offer the necessary flexibility to integrate the State's growing amount of intermittent renewable resources.

As detailed below, the Commission has addressed issues relating to non-NEM generators' utilization of the IOUs' Station Power Tariffs in several recent decisions. Significantly, in these decisions the Commission has expressly deferred consideration of netting rules. In fact, the Commission has repeatedly stated that "inventing a new netting scheme [for generators subject to 15-minute netting] is a substantial policy question" which can only appropriately be addressed through a rulemaking.<sup>6</sup>

The Commission's inaction has maintained, by administrative default, an anachronistic 15-minute netting period that no longer corresponds to the reality of California's electric policies, operations, or economics. In light of the Commission's reaffirmation of the appropriateness of 12-month netting for NEM generators, the gross disparity between the 12-month and 15-minute netting periods, and the economic burden that the 15-minute netting period imposes on non-NEM generators, the Commission has a duty to re-assess the appropriateness of 15-minute netting for large generators and the harm it causes California electric consumers.

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<sup>6</sup> Resolution E-4673, at 10, 14; *see also* D.15-04-031, Order Modifying Resolution E-4673 and Denying Rehearing or Resolution As Modified, mimeo at 14 (Ordering Paragraph 1.b).

While many parties will likely be interested in helping to set more equitable and consistent netting rules for California generation resources, the issue is discrete and is capable of being resolved through a focused rulemaking. Calpine is not aware that the 15-minute netting period imposed on non-NEM generators is within the scope of any current or contemplated Commission proceeding.<sup>7</sup> Calpine respectfully requests that the Commission promptly open a new rulemaking to address this important issue.<sup>8</sup>

## **II. BACKGROUND**

### **A. Generators Must Rely on and Import Energy from the Grid to Start Their Generators or Serve On-Site Load.**

Almost all generation resources must import some amount of electricity from the grid to start the generators or meet internal load obligations such as heating, lighting, and air-conditioning. In the context of larger generators, the energy used to respond to internal electric requirements is commonly referred to as “station power” load.

The need to rely on the grid for some amount of power is not unique to a single class of generators. No generating facility – whether it is solar, wind, geothermal, or any other large or small renewable resource – operates consistently 24 hours a day, 365 days a year. Just like a large natural gas generator needs electricity from the grid to operate its office equipment when the generator is offline for maintenance, a residence with rooftop solar must similarly import electricity from the grid to power its dishwasher when the sun is not shining. While the electricity that a home with rooftop solar consumes from the grid is not typically referred to as

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<sup>7</sup> The Commission is currently considering issues related to station power within the context of Track 2 of its energy storage proceeding (R.15-03-011). The Commission and the California Independent System Operator (“CAISO”) held a joint workshop on station power issues related to energy storage on May 3, 2016. However, Calpine is not aware that the 15-minute netting period for non-NEM generators that require station power is within the scope of either of these Commission or CAISO proceedings.

<sup>8</sup> Public Utilities Code Section 1708.5(b)(1)(2) requires that the Commission “consider [this] petition and, within six months from the date of receipt of the petition, either deny the petition or institute a proceeding to adopt, amend, or repeal the regulation.”

“station power,” it serves the same functional purpose (i.e. keeping the lights on when self-generation is insufficient or unavailable).

**B. The Present Rules Dictate that One Class of Generator Customers Must Purchase Grid Power Based on a 15-Minute Netting Period**

The Commission has participated in a prolonged debate regarding station power issues, particularly with respect to the CAISO’s Station Power Protocol (“SPP”) tariff. A detailed history of these proceedings is set forth in the Resolutions the Commission issued in 2014 approving modifications to the IOUs’ Station Power Tariffs.<sup>9</sup> In these Resolutions, the Commission clearly expressed that it considers the netting period to be a policy issue that should be appropriately resolved through a rulemaking, which is the precise relief this Petition requests.

Before 2006, a generator’s energy consumption that exceeded its exports to the grid – measured on a 15-minute metering interval – was generally considered retail load.<sup>10</sup> The IOUs assessed energy and transmission charges for this retail load pursuant to the terms of their respective Otherwise Applicable Tariffs (“OATs”).<sup>11</sup> In 2006, in response to an order from the Federal Energy Regulatory Commission (“FERC”), the CAISO implemented its SPP tariff. The SPP tariff identified specific circumstances in which a generator’s output could be netted against its imports from the grid.<sup>12</sup> The SPP tariff authorized generators to net generation against their internal load consumption over a one-month period.<sup>13</sup>

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<sup>9</sup> See Resolution E-4673; Resolution E-4674.

<sup>10</sup> See Resolution E-4673, at 4; Resolution E-4674, at 4.

<sup>11</sup> *Cal. Independent System Operator Corp.* 111 FERC ¶ 61,452, at 7 (2005).

<sup>12</sup> Resolution E-4673, at 4-5; Resolution E-4674, at 4-5.

<sup>13</sup> Resolution E-4673, at 5; Resolution E-4674, at 4.



In 2008, SCE challenged the SPP tariffs and FERC's associated rulings at the D.C. Circuit Court of Appeals.<sup>14</sup> SCE asserted that it would be deprived of full revenue recovery for its deliveries to generators because the SPP tariff allowed for monthly netting.<sup>15</sup> The D.C. Circuit concluded that, while FERC had established an appropriate netting methodology for purposes of assessing CAISO transmission, it had exceeded its authority in using that same netting methodology to determine whether a retail sale occurred. The D.C. Circuit accordingly vacated the SPP tariff and remanded to FERC for the purpose of revising the tariff.<sup>16</sup> The D.C. Circuit, however, did not specifically address the appropriateness of the one-month netting period used in the CAISO's SPP tariff.<sup>17</sup>

In August 2010, FERC issued an Order on Remand that allowed California to use its own netting methodology for assessing retail station power charges.<sup>18</sup> In November 2011, the IOUs relied on the FERC Order on Remand to support their advice letters requesting that the Commission modify the IOUs' Station Power Tariffs to, among other changes, measure the amount of retail sales made to a generator on the basis of a 15-minute netting period.<sup>19</sup>

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<sup>14</sup> *So. Cal. Edison Co. v FERC*, 603 F.3d 996 (D.C. Cir. 2010) (challenging 125 FERC ¶ 61,072 (2008)).

<sup>15</sup> *Id.*

<sup>16</sup> *Id.*, at 1002.

<sup>17</sup> *Id.*

<sup>18</sup> *Duke Energy Moss Landing LLC v. Cal. Independent System Operator Corp.*, 132 FERC ¶ 61,183 (2010). Generators that were participating in the CAISO's SPP tariff proceeding appealed FERC's Order on Remand to the D.C. Circuit, but the court ultimately upheld FERC's Order on Remand. *See Calpine Corp. v. FERC*, 702 F.3d 41, 45 (D.C. Cir. 2012).

<sup>19</sup> SDG&E's Advice Letter 1807-E-B; SCE's Advice Letter 2576-E-A; PG&E's Advice Letter 3951-E-B (collectively, the "Station Power Advice Letters").

Generators and other parties protested the IOUs' Station Power Advice Letters.<sup>20</sup> The protests asserted that the advice letter process was not an appropriate vehicle for the Commission to decide on a universal methodology for netting a generator's imports against its exports. The protests further explained that the Commission had not yet established a policy for station power netting and asked the Commission to adhere to its precedents and only consider any changes to its station power policies that were adopted through a rulemaking.<sup>21</sup>

In Resolutions issued in August 2014, the Commission approved the Station Power Advice Letters, determining that the IOUs' request to decrease the netting period from one-month to 15-minutes did not introduce any new netting methodology.<sup>22</sup> The Commission rationalized that the IOUs only proposed to revert to the 15-minute metering intervals that the IOUs' OATs had previously applied to generators.<sup>23</sup> Most importantly, the Commission also expressly declined to substantively address the appropriateness of 15-minute netting:

*The issue of what should be the appropriate netting period is not before the Commission at this time. ... [I]nventing a new netting scheme is a substantial policy question for which the informal advice letter process is an inappropriate vehicle.*<sup>24</sup>

In seeking rehearing of the Station Power Resolutions,<sup>25</sup> generators asserted that the Station Power Resolutions were inconsistent. On one hand, they proclaimed that the issue of the appropriate netting period was not before the Commission and should not be considered in the

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<sup>20</sup> The Station Power Advice Letters were protested by, Calpine Corporation, High Desert Power Project, LLC, Independent Energy Producers Association, NRG Energy, Western Power Trading Forum, and the Cogeneration Association of California and the Energy Producers and Users Coalition (collectively, the "Protestors"). See Resolution E-4673; Resolution E-4674.

<sup>21</sup> See Resolution E-4673, at 10; Resolution E-4674, at 11.

<sup>22</sup> Resolution E-4673, at 12; Resolution E-4674, at 13.

<sup>23</sup> *Id.*

<sup>24</sup> Resolution E-4673, at 12, 14 (emphasis added).

<sup>25</sup> See D.15-04-031.

“informal advice letter process,” but on the other hand they authorized the IOUs to reduce the applicable netting interval from one month to 15 minutes – with significant economic consequences for non-NEM generators.

In April 2015, in orders denying rehearing of the Station Power Resolutions, the Commission reiterated that, for purposes of the Station Power Resolutions:

*The Commission is not considering any new netting methodologies at this time.* Rather, as explained above, the issue before the Commission is whether to resume applying [the IOUs’] OATs for station power, which use 15-minute interval metering.<sup>26</sup>

While the Commission characterized this decision as simply a resumption of a prior practice, it failed to address at least two critical issues: (1) whether a 15-minute netting period is appropriate for any class of generators; and (2) the policy and legal implications of subjecting non-NEM generators to a netting period that is 35,040 times shorter than the 12-month netting period for NEM generators. The Commission’s approval of the Station Power Advice Letters arbitrarily imposed an outdated 15-minute netting period without any consideration of the Commission’s endorsement of a 12-month netting period for the NEM generators.

Given that the electric service the IOUs provide to NEM and non-NEM generators is identical (i.e. delivering power from the grid when internal generation is insufficient or unavailable), and that the function of the netting period is identical (i.e. calculating the amount of energy the generator must purchase at retail rates), the Commission should have assessed the netting period for non-NEM generators in a manner consistent and equitable with its treatment of NEM generators.

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<sup>26</sup> D.15-04-031, mimeo at 14 (Ordering Paragraph 1.b).

**C. Another Class of Customer Generators Benefits from a 12-Month Netting Period**

In 2009, then-Governor Schwarzenegger signed into law AB 920, requiring the IOUs to compensate qualifying NEM generators for the electricity they deliver to the grid which exceeds their consumption of electricity over a 12-month period. In particular, AB 920 modified Public Utilities Code Section 2827(h)(3) to require that a 12-month netting period be used for determining whether a qualifying NEM generator was a net surplus generator or consumer of electricity.<sup>27</sup>

Consistent with this mandate, in D.11-06-016, the Commission established a net surplus compensation rate to be paid to such qualifying generators who produce more electricity than they consume over a 12-month period. As support for the adoption of the 12-month netting period, the Commission explained:

[T]racking individual customer usage and exports more frequently than on an annual basis would drive up administrative costs and deviates too greatly from the existing NEM program and statute. [Public Utilities Code Section 2827] repeatedly refers to net surplus as calculated over a 12-month period. Within the 12-month period, customers offset their usage with their generation at the full retail electric rate.<sup>28</sup>

In 2013, Governor Brown signed into law AB 327, requiring that the Commission develop a successor to the existing NEM tariffs, to be implemented by the IOUs on July 1, 2017, or when they reach the NEM program enrollment limit, whichever is earlier. In 2014, the

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<sup>27</sup> Pub. Util. Code § 2827(h)(3) (“At the end of each 12-month period, where the electricity generated by the eligible customer-generator during the 12-month period exceeds the electricity supplied by the electric utility during that same period, the eligible customer-generator is a net surplus customer-generator and the electric utility, upon an affirmative election by the net surplus customer-generator, shall either (A) provide net surplus electricity compensation for any net surplus electricity generated during the prior 12-month period, or (B) allow the net surplus customer-generator to apply the net surplus electricity as a credit for kilowatthours subsequently supplied by the electric utility to the net surplus customer-generator.”).

<sup>28</sup> D.11-06-016, mimeo at 29.

Commission opened Rulemaking 14-07-002 to design the NEM successor tariff. This proceeding recently culminated in the Commission’s decision adopting a NEM successor tariff (i.e. D.16-01-044).<sup>29</sup>

In D.16-01-044, the Commission re-affirmed the appropriateness of a 12-month netting period for NEM generators, ruling that the “annual true-up” should be continued in the NEM successor tariff:

[The 12-month netting period] preserves the value of net metering for all customers, but is particularly important for customers that have large seasonal variations in their electricity usage, such as agricultural operations and schools. Requiring true-ups on a monthly basis would cause significant losses for those customers, who rely on the annual cycle to even out the economic impact of their highly variable usage. *Even customers without such sharp variations in their usage would stand to lose value under a monthly true-up, since some seasonal variation is present in all customers’ usage patterns.*<sup>30</sup>

D.16-01-044 reaffirms the Commission’s determination that generators that qualify for NEM treatment will have their net purchases of electricity measured on the basis of a 12-month netting period.

**D. 15-Minute Netting Periods Disproportionately Impact Large Generators and Increase Overall Energy Costs for California Electric Consumers.**

Modern, flexible conventional generation resources have been, and must continue to be, a critical component of the State’s strategy for increasing grid reliability and cost-effectively integrating increasingly-higher levels of intermittent generation. Flexible generation resources enable grid operators to efficiently vary the output of resources to facilitate reliable grid operations and balance out the variations of supply, including the intermittent supply offered by

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<sup>29</sup> Several parties filed Petitions for Modification of D.16-01-044, including SDG&E, SCE, PG&E, The Utility Reform Network, and the Coalition of California Utility Employees. None of these Petitions challenged the Commission’s findings with respect to the netting rules for NEM.

<sup>30</sup> D.16-01-044, mimeo at 95 (emphasis added).

NEM generators who currently qualify for 12-month netting of their generation. Accordingly, efficient and flexible generation resources remain an indispensable component of achieving Senate Bill (“SB”) 350’s goal for a “diverse and balanced portfolio of resources . . . to ensure a reliable electricity supply that provides optimal integration of renewable energy in a cost-effective manner.”<sup>31</sup>

California’s generation fleet continues to undergo a major transition. Older units dependent on once-through cooling technology are retiring,<sup>32</sup> and all of California’s nuclear resources will be shut down by 2025.<sup>33</sup> Notwithstanding these reductions in overall generation capacity and the increasing need for flexible generating facilities, even some of the more modern and efficient gas-fired generation may soon shut down because they are no longer economically viable.

In addition, California’s stated preferences for renewables, combined with the Commission’s rules for counting renewables towards Resource Adequacy requirements, has significantly diminished the opportunities for many generation resources to be awarded long-term contracts, despite the high efficiency, operational flexibility, and overall cost-effectiveness of such units. Many of these generators must currently resort to short-term capacity contracts as their sole source of revenue, and it has become increasingly difficult for generators to secure compensatory capacity contracts each year. The ongoing viability of these relatively new,

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<sup>31</sup> SB 350, codified in Pub. Util. Code § 454.51(a).

<sup>32</sup> See The California Energy Commission, *Once-Through Cooling Phase-Out*, at 5 (last updated February 9, 2016) (“As a general rule, most of the owners of fossil-fueled generating facilities . . . have abandoned plans to pursue [a compliance track] and have announced retirement plans.”). A copy is available at: [http://www.energy.ca.gov/renewables/tracking\\_progress/documents/once\\_through\\_cooling.pdf](http://www.energy.ca.gov/renewables/tracking_progress/documents/once_through_cooling.pdf).

<sup>33</sup> On June 21, 2016, PG&E announced its plan to seek Commission approval to shut down its Diablo Canyon nuclear facility in 2025.

highly-efficient, and flexible modern generating facilities is increasingly uncertain in light of the uneconomic circumstances they currently face.

Imposition of the unjust, unreasonable, and discriminatory 15-minute netting period on non-NEM generators artificially increases these generators' costs and correspondingly decreases their cost-competitiveness. The premature retirement of these units resulting from the failure of the system to provide adequate compensation for the reliability and flexibility value they contribute will greatly reduce the reliability of grid operations, increase costs for electric consumers, and impede cost-effective renewable integration. To prevent these adverse economic consequences, the Commission needs to address the merits, justifications for, and fairness of continuing to impose a 15-minute netting period on any generator.

### **III. THE CALIFORNIA CONSTITUTION, PUBLIC UTILITIES CODE, AND THIS COMMISSION'S PRECEDENTS REQUIRE THAT THE COMMISSION ADOPT EQUITABLE NON-DISCRIMINATORY NETTING PERIODS FOR GENERATION RESOURCES**

The California Constitution requires that the Commission actively supervise and regulate public utility rates.<sup>34</sup> Public Utilities Code Section 451 mandates that the Commission set all rates and charges collected by a public utility at "just and reasonable" levels. In addition, Public Utilities Code Section 453 requires that "[n]o public utility shall . . . make or grant any preference or advantage to any corporation or person or subject any corporation or person to any prejudice or disadvantage."

With respect to Section 453, the Commission has determined that "[w]henver two similarly situated customers are provided different services or rates, an issue of discrimination

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<sup>34</sup> See Cal. Const. Art. XII; see also *Southern California Edison Co. v. Peevey*, 31 Cal.4th 781, 792 (Cal. 2003) (the Commission is a "state agency of constitutional origin with far-reaching duties, functions and powers whose 'power to fix rates [and] establish rules' has been 'liberally construed.'" (internal citations omitted)).

arises.”<sup>35</sup> The antidiscrimination rules place a burden on the IOUs to set rates that are non-discriminatory:

A public utility’s obligation in providing its service to the public is to charge the same rates and charges to all customers within the same class of service so that no customer receives any unfair advantage over other customers within the class.<sup>36</sup>

The purpose of these antidiscrimination rules for ratesetting is to prevent the unfair advantage that results from the IOUs discriminating in the rates they charge different customers receiving the same type of service.<sup>37</sup>

The Commission’s current netting policies violate both the “just and reasonable” requirement in Section 451 and the antidiscrimination requirement in Section 453. On its face, the gross disparity between a 15-minute netting period imposed on one group of generators and a 525,600-minute (i.e. 12-month) netting period available to other generators serves as a *prima facie* showing of unlawful discrimination. The disparity between these netting periods enables the IOUs to assess substantially larger utility charges for electricity provided to similarly-situated customer generators. Yet the service the utility provides, and the costs it incurs to provide the service, are the same – delivering power from the grid during periods in which the generator is not able to satisfy its own internal electric needs.

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<sup>35</sup> See D. 97-12-044, 1997 Cal PUC LEXIS 1220, at \*32.

<sup>36</sup> D.87-10-034, 1987 Cal. PUC LEXIS 282, at \*22.

<sup>37</sup> See D.01-09-059, 2001 Cal. PUC LEXIS 857, at \*105-106 (“[t]he primary purpose of the Public Utilities Act . . . is to insure the public adequate service at reasonable rates without discrimination”); D.95-02-045, 1995 Cal. PUC LEXIS 96, at \*3 (“Discrimination is shown by demonstrating that differences among customers are undue because they are not justified in light of the factual circumstances.”). The purpose behind the notion of nondiscrimination in rates is longstanding. See e.g., *PG&E Co.*, Decision No. 7576, 18 CRC 201, 206 (1920) (“Discrimination in rates as between customers receiving the same character of service is viewed with disfavor because of the unfair advantage which the favored customers have over those not so favored.”).



Even apart from the unlawfulness of the discriminatory station power netting rules, there is no economic, equitable, or operational justification for further maintaining the 15-minute netting period. In 2014, the Commission “resumed” the 15-minute netting period, despite asserting that it was making no change and despite providing no economic or policy basis for doing so. In any event, the 15-minute netting period is based on an outdated standard that no longer aligns with current Commission policies, grid operations, or economics.<sup>38</sup> The shortness of the 15-minute netting period denies generators any meaningful ability to effectively net their internal usage against the power they generate. Moreover, the unjustified use of this anachronistic netting rule threatens the future availability of many reliable and flexible generation resources, will serve to reduce the overall reliability of the State’s energy supply, and impairs the State’s ability to cost-effectively meet SB 350’s goals.

By this request, Calpine does not challenge the appropriateness of the 12-month netting standard for qualifying NEM generators. Instead, Calpine seeks to determine a lengthier and equitable netting period for the generation resources who are currently denied the 12-month netting period offered to NEM generation resources. As stated by the Commission, the length of the netting period for any generator currently denied the 12-month netting period is a “substantial policy issue” that should be resolved through a rulemaking and decided based on applicable legal requirements, fundamental fairness, and the best interests of California electric customers.

Admittedly, a shorter netting period for some generators “benefits” California’s other electric customers by exacting more retail revenues from these generators, which can then be used to lower the rates charged other customers. But this subsidization raises important policy

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<sup>38</sup> The use of 15-minute netting intervals can be found in Commission decisions related to energy industry restructuring in the late 1990s, nearly 20 years ago. *See* D.97-10-087, 1997 Cal. PUC LEXIS 1211.

and legal issues related to discrimination, and ignores the deleterious long-term harm on the supply of California's generation resources.

It is imperative that the Commission fulfill its obligations under the California Constitution to actively supervise and regulate public utility rates as well as its statutory mandate to ensure that rates are just, reasonable, and non-discriminatory. Accordingly, the Commission should open a rulemaking to address the appropriateness of the current 15-minute netting methodology for station power.

#### **IV. ISSUES REQUIRING INVESTIGATION**

The Commission will need to address the following issues as part of a rulemaking on station power netting rules:

- **Netting Methodology:** whether it is appropriate to maintain a 15-minute netting period for calculating retail electric purchases for non-NEM generation resources.

The Commission should initiate this effort without delay. While the analysis will take time and engage the interests of multiple market participants, the appropriate netting interval is a discrete issue that can be efficiently addressed through a rulemaking with a limited scope.

#### **V. CONCLUSION**

Calpine appreciates that the Commission has many issues to address and scarce resources. However, it is of critical importance that the netting period for all generators be established in a non-discriminatory, equitable manner to best ensure that California will be able to offer its electric consumers reliable, safe, and cost-effective energy that advances the goals of SB 350. Calpine accordingly urges the Commission to add station power netting to the list of important issues that the Commission will address this year.

Respectfully submitted,

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July 12, 2016

Attorneys for Calpine Corporation

**Attachment A**

**COMPLIANCE WITH CPUC RULE 6.3**

## **Attachment A**

### **COMPLIANCE WITH COMMISSION RULE 6.3**

Pursuant to the Rules of Practice and Procedure of the Commission (“Rules”), Rule 6.3(a) provides that, “any person may petition the Commission under Public Utilities Code section 1708.5 to adopt, amend, or repeal a regulation. The proposed regulation must apply to an entire class of entities or activities over which the Commission has jurisdiction and must apply to future conduct.” The relief sought herein complies with this requirement because it would apply to the entire class of current and prospective generation resources that purchase electricity pursuant to the IOUs’ Station Power Tariffs, which is a subject over which the Commission has jurisdiction. Moreover, the Calpine seeks Commission action that would be applicable to future conduct and does not seek any retroactive relief.

Rule 6.3(b) provides that “[a] petition must concisely state the justification for the requested relief, and if adoption or amendment of a regulation is sought, the petition must include specific proposed wording for that regulation. In addition, a petition must state whether the issues raised in the petition have, to the petitioner’s knowledge, ever been litigated before the Commission, and if so, when and how the Commission resolved the issues, including the name and case number of the proceeding (if known).” Sections I, II, and III herein state the justification for the requested relief. These Sections explain why it is appropriate for the Commission to open a rulemaking with respect to the station power netting methodology.

Rule 6.3(b) further requires that, “[a] petition that contains factual assertions must be verified. Unverified factual assertions will be given only the weight of argument. The caption of a petition must contain the following wording: ‘Petition to adopt, amend, or repeal a regulation pursuant to Pub. Util. Code § 1708.5.’” The factual assertions contained in this Petition are verified (see Attachment B) and the Petition is named in accordance with Rule 6.3(b).

Finally, Rule 6.3(c) requires that, “[p]etitions must be served upon the Executive Director, Chief Administrative Law Judge, Director of the appropriate industry division, and Public Advisor. Prior to filing, petitioners must consult with the Public Advisor to identify any additional persons upon whom to serve the petition. If a petition would result in the modification of a prior Commission order or decision, then the petition must also be served on all parties to the proceeding or proceedings in which the decision that would be modified was issued. The assigned Administrative Law Judge may direct the petitioner to serve the petition on additional persons.” Calpine has also complied with these requirements and have served this Petition on the service lists in the dockets listed in Attachment C hereto. When an ALJ is assigned to this proceeding, Calpine will comply with any further service directions that are provided.

**Attachment B**

**VERIFICATION  
(Rule 1.11)**

**Attachment B**

**VERIFICATION  
(Rule 1.11)**

I am the attorney for Calpine Corporation; said party is absent from the County of San Francisco, California, where I have my office, and I make this verification for said party for that reason. The statements in the foregoing Petition are true of my own knowledge, except as to matters which are therein stated on information or belief, and as to those matters I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct and executed on July 12, 2016, at San Francisco, California.

Respectfully submitted,

/s/  
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## **Attachment C**

Commission Rule 6.3 Service Requirement

R.14-07-002 Service List

R.15-03-011 Service List



**Commission Rule 6.3 Service Requirement**

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Edward F. Randolph, Director of Energy Division California Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94102	Public Advisor California Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94102

## CALIFORNIA PUBLIC UTILITIES COMMISSION

### Service Lists

Proceeding: R1503011 - CPUC - OIR TO CONSID

Filer: CPUC

List Name: LIST

Last changed: July 6, 2016

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